

**R. DUANE FRIZELL, ESQ.**

Nevada Bar No. 9807

**FRIZELL LAW FIRM**

400 N. Stephanie St., Suite 265

Henderson, Nevada 89014

Office (702) 657-6000

Fax (702) 657-0065

[DFrizell@FrizellLaw.com](mailto:DFrizell@FrizellLaw.com)

*Attorney for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALLSTATE INSURANCE COMPANY;  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY; ALLSTATE  
INDEMNITY COMPANY; and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

Plaintiffs,

vs.

OBTEEN N. NASSIRI, an individual; and  
MED ED LABS, a Nevada nonprofit  
corporation,

Defendants.

CASE NO. 2:20-cv-00425-JCM-DJA

**STIPULATION AND ORDER  
FOR EXTENSION OF DEFENDANTS' DEADLINE TO FILE RESPONSE TO  
PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES [Doc 76]  
(FIRST REQUEST)**

By and through their respective counsel of record, Defendants OBTEEN N. NASSIRI ("Nassiri") and MED ED LABS ("MEL") and Plaintiffs ALLSTATE INSURANCE COMPANY, ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY, and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY hereby tender to the Court this *Stipulation and Order for Extension of Defendants' Deadline to File Response to Plaintiffs' Motion to Compel Discovery Responses [Doc 76] (First Request)*. In this connection, Plaintiffs and Defendants (each a "Party" and collectively the "Parties") hereby stipulate and agree as follows:

1           1. Defendants have been working on supplementing their disclosures of documents  
2 and responses to Plaintiffs' requests for production to MEL.

3           2. On February 19, 2021, Defendants supplemented their disclosures with more than  
4 2,500 pages worth of documents. They also included an index of all documents produced  
5 by Defendants as of that date.

6           3. By 12:00 noon on February 25, 2021, Defendants will further supplement their  
7 disclosures with approximately 1,300 pages additional documents (to include hundreds of  
8 pages of invoices to MEL's customers) and an updated index.

9           4. By 12:00 noon on February 25, 2021, Defendants will also supplement their  
10 responses to Plaintiffs' request for production to MEL, with references to specific Bates  
11 numbers.  
12

13           5. In order to accommodate Defendants in their making the forthcoming  
14 supplements identified above, the Parties have agreed to extend Defendants' deadline to  
15 file a response to *Plaintiffs' Motion to Compel Discovery Responses [Doc 76]* from  
16 February 24, 2021 (old deadline) to March 3, 2021 (new deadline).  
17  
18

19 IT IS SO STIPULATED.

20 Dated: February 24, 2021

February 24, 2021

21 **FRIZELL LAW FIRM**  
22 400 N. Stephanie St., Suite 265  
23 Henderson, Nevada 89014

**FORAN GLENNON**  
2200 Paseo Verde Parkway, Suite 280  
Henderson, Nevada 89052

24 By: /s/ R. Duane Frizell  
25 R. DUANE FRIZELL, ESQ.  
26 Nevada Bar No. 9807  
27 *Attorney for Defendants*  
28

By: /s/ Lee H. Gorlin  
DYLAN P. TODD, ESQ.  
Nevada Bar No. 10456  
LEE H. GORLIN, ESQ.  
Nevada Bar No. 13879  
*Attorneys for Plaintiffs*

**ORDER**

Having reviewed the foregoing Stipulation of the Parties, and finding good, just, and sufficient cause therefor, it is hereby entered as an Order of the Court.

IT IS SO ORDERED.

DATED: February 25, 2021

  
UNITED STATES MAGISTRATE JUDGE  
CASE NO. 2:20-cv-00425-JCM-DJA

***Submitted by:***

**FRIZELL LAW FIRM**  
400 N. Stephanie St., Suite 265  
Henderson, Nevada 89014

By: */s/ R. Duane Frizell*  
**R. DUANE FRIZELL, ESQ.**  
*Attorney for Defendants*